

In The Matter Of:
ADAM SINDELL vs.
LATONYA COACH, et al.

LaTonya Coach
June 26, 2023

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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

ADAM SINDELL,

Plaintiff,

v.

Civil Action File

No: 5:22-cv-00365-TES

LATONYA COACH, et al.,

Defendants.

The videoconference deposition of LATONYA COACH, taken on behalf of the Plaintiff, taken pursuant to agreement of counsel, taken for all purposes authorized by the Federal Rules of Civil Procedure; the reading and signing of the deposition being reserved; taken before Bonnie L. Smith, RPR, Certified Court Reporter, commencing at 10:00 a.m., on this the 26th day of June, 2023, via Zoom Videoconference.

1 APPEARANCES OF COUNSEL:

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Cross-Examination by Ms. Burton5

E X H I B I T S

(No Exhibits Marked)

P R O C E E D I N G S

WHEREUPON, the following proceedings were taken pursuant to the Federal Rules of Civil Procedure.

COURT REPORTER: Will counsel please introduce themselves and state any objection to the witness being sworn in remotely.

MS. BURTON: Good morning. I'm Jessica Burton. I am here on behalf of the plaintiff, Adam Sindell, and I have no objection.

MR. WAYMIRE: Jason Waymire on behalf of the defendants. No objection.

(Whereupon,

LATONYA COACH

was called as a witness and, having first been duly sworn, was examined and testified as follows:)

MS. BURTON: This will be the deposition of LaTonya Coach taken by notice and agreement of counsel. Do you agree to reserve all objections except for forms of question and responsiveness of the answer until first use, Jason?

MR. WAYMIRE: Yes. And she'll reserve signature. We'll read and sign.

MS. BURTON: Perfect.

1 CROSS-EXAMINATION

2 BY MS. BURTON:

3 Q Good morning, Ms. Coach. My name is Jessica
4 Burton. As I stated prior to your swearing in, I
5 represent Mr. Sindell.

6 A Okay.

7 Q So I just kind of want to go over some
8 preliminary stuff before we get started and dive into
9 everything. Have you ever given a deposition before?

10 A No.

11 Q Okay. Have you ever testified in court
12 before?

13 A No.

14 Q Okay. So then what I'll do is I'll just
15 kind of go over some ground rules and just some
16 preliminary matters before we get into it. So you do
17 understand that you are under oath; correct?

18 A That's correct.

19 Q And because we have a court reporter, we
20 need a verbal response to any questions. The court
21 reporter is taking down everything that you say and
22 it's really hard to transcribe body language. So just
23 make sure that if you do answer a question, it's a
24 verbal response.

25 If you don't -- if you don't understand a

1 question that I ask, please let me know. Sometimes I
2 ask some really bad questions and I'm happy to
3 rephrase or clarify the question. But if you do
4 answer the question, then is it fair to assume that
5 you understood the question?

6 A Yes. That's correct.

7 Q Okay. Have you taken any medications this
8 morning?

9 A Yes.

10 Q Okay. What medications have you taken?

11 A Ozempic, one milligram; Mobic,
12 15 milligrams; Claritin, 10 milligrams; and
13 Pantoprazole, 20 milligrams.

14 Q Okay. Do any of these medications affect
15 your ability to give this deposition?

16 A No.

17 Q Okay. Do you have any prescription
18 medications that you should be taking that, by not
19 taking them, it would affect your ability to give this
20 deposition?

21 A No.

22 Q Okay. And other than what you've already
23 described to me, have you -- are you under the
24 influence of any alcohol or any other drugs or
25 medications?

1 A No.

2 Q Okay. And also, this is your deposition. I
3 don't want to make you uncomfortable or anything like
4 that. So if at any point you feel like you need to
5 take a break, then just let me know. And I'm happy
6 to, you know, take a quick five-, 10-minute break as
7 you need if you need to get up, go to the restroom or
8 just stretch your legs. The only thing is that if
9 there is a question that's pending, I would request
10 that you answer the question before we go on break.
11 Is that fair?

12 A Understood.

13 Q All right. What is your full legal name?

14 A LaTonya LaTrelle Coach.

15 Q Okay. And would you mind spelling that for
16 the court reporter?

17 A L-A, capital T, O-N-Y-A. LaTrelle is L-A,
18 capital T, R-E-L-L-E. Last name is Coach, C-O-A-C-H.

19 Q Okay. And do you have any nicknames that
20 you go by?

21 A Yes.

22 Q What are your nicknames?

23 A Kissy, K-I-S-S-Y.

24 Q Okay. Any other names or aliases?

25 A No.

1 Q Okay. Are there any other names that you
2 have gone by other than the legal name that you just
3 gave me and the nickname?

4 A Yes.

5 Q What is your prior name?

6 A LaTonya LaTrelle May, M-A-Y.

7 MS. BURTON: And can we go off the record
8 for just a second?

9 (Whereupon, a discussion was held off the
10 record.)

11 MS. BURTON: All right. I am ready to go
12 back on the record if everybody else is ready.

13 BY MS. BURTON:

14 Q Okay. Do you live with anybody else at this
15 address?

16 A Yes.

17 Q Who do you live with who is over the age of
18 18?

19 A My husband.

20 Q And what's your husband's name?

21 A Roderick Coach.

22 Q How long have you two been married?

23 A Seventeen years.

24 Q Do you have any children together?

25 A Yes.

1 Q Okay. Are they over the age of 18?

2 A No.

3 Q And then who is primarily responsible for
4 the bills at your house?

5 A My husband and I.

6 Q All right. And then what's the highest
7 level of education that you've completed?

8 A Four years of college. Well, I have four
9 years, but I did not obtain the degree.

10 Q Okay. What were you studying when you were
11 in college?

12 A Education.

13 Q What college did you attend?

14 A Fort Valley State University.

15 Q You said Fort Valley State?

16 A University.

17 Q And what years did you attend this
18 university?

19 A 1996 through 19' -- excuse me -- through
20 2002.

21 Q And is there any reason that you did not
22 complete your degree?

23 A I could not pass the practice exam at the
24 end of the -- I guess at the end, the requirements
25 exam before I could student teach. So I could not

1 pass -- I did not pass that, so I just never did make
2 the attempt to go back.

3 Q Okay. Do you have any plans to go back in
4 the future?

5 A I'm undecided at the moment.

6 Q Okay. And then did you attend this college
7 immediately after you graduated high school?

8 A No.

9 Q Okay. How much time elapsed between high
10 school and college?

11 A Eight months.

12 Q Okay. So within the year then?

13 A Absolutely.

14 Q All right. So what high school did you
15 attend?

16 A Wilkerson County High School.

17 Q All right. Did you graduate in 1995 or '96?

18 A 1995.

19 Q And you attended there all four years?

20 A Yes.

21 Q So once you graduated and you were, I guess,
22 waiting for college, did you work or do anything else
23 in that eight-month period?

24 A Yes. I worked.

25 Q Okay. Where did you work?

1 A At Subway.

2 Q How long were you at Subway?

3 A Eight months.

4 Q And you left to go to college?

5 A Yes.

6 Q Okay. Let's see. So then once you
7 complete -- well, once you finished up with -- well,
8 let me ask it this way. Once you left -- once you
9 left college, where did you go?

10 A I began working at Lindsey -- no, no, no,
11 no. I was -- while I was in college, I worked at
12 Pizza Hut. I worked at Pizza Hut up until 2009. But
13 I was working at Pizza Hut and I was at -- I was a
14 full-time substitute teacher and then I became a
15 paraprofessional at Lindsey Elementary School. And I
16 did that until --

17 Q Well, let's go one by one on these. So
18 whenever you were at Subway, did you have any manager
19 experience or were you just kind of on the line?

20 A On the line.

21 Q Okay. And then with Pizza Hut, what did you
22 do there?

23 A I started out as a server and I became a
24 manager.

25 Q All right. And then how long -- well, I

1 guess -- so when you were in college, you started with
2 Pizza Hut. So was that in --

3 A 1996.

4 Q 1996. Okay. And how long were you a
5 manager for?

6 A Maybe 11 years. I'm not sure. I can't
7 remember exactly.

8 Q Okay. And then once you left Pizza Hut,
9 what was your reason for leaving there?

10 A Can we go back while I was at Pizza Hut?

11 Q Sure.

12 A I was working at Pizza Hut and subbing
13 paraprofessional at the same time.

14 Q Okay.

15 A I became a full-time parapro in 2004. So I
16 was working both jobs from 2004 until -- I was working
17 both jobs in 2004.

18 Q And you said the school's name was Lindsey
19 what?

20 A Lindsey Elementary School.

21 Q Did you enjoy it?

22 A I did.

23 Q Okay. So then did you leave Pizza Hut
24 because you got the parapro position?

25 A No.

1 Q Okay. What was the purpose for leaving
2 Pizza Hut?

3 A I was terminated.

4 Q Okay. What were you terminated for?

5 A I can't -- why did I -- one of my coworkers
6 and I -- I cussed the manager out. I cussed another
7 manager out.

8 Q Okay. And then how much time between you
9 leaving there did you come on with -- well, I guess --
10 never mind. Scratch that one because I think you said
11 you were doing that simultaneously. So you had
12 already become a parapro by the time you left Pizza
13 Hut; is that correct?

14 A That's correct.

15 Q Okay. And then is becoming a parapro the
16 reason why you stopped studying?

17 A Yes.

18 Q Okay. And then how long were you at Lindsey
19 Elementary School?

20 A From 2004 until 2010.

21 Q Okay. And what was your -- was it always at
22 Lindsey Elementary School?

23 A Yes.

24 Q And what was your reason for leaving that
25 job?

1 A I got another job.

2 Q Okay. And what job was that?

3 A I began working at -- I started working for
4 the Department of Corrections.

5 Q So were you working in the office or did you
6 get a job over at one of the prisons?

7 A At one of the prisons.

8 Q Which prison?

9 A Macon State Prison.

10 Q And how long were you there for?

11 A Nine years, seven months.

12 Q And what was your job at Macon State Prison?

13 A I began as a correctional officer. Then in
14 2016, I was promoted to a sergeant.

15 Q In 2010?

16 A 2010 I began at Macon State. In 2016, I was
17 promoted to a sergeant.

18 Q Okay. And what were your responsibilities
19 as a sergeant?

20 A I was a first-line supervisor for the shift,
21 making sure that the inmate count was accurate,
22 maintaining a controlled, safe and secure environment,
23 just making sure people on my staff came to work on
24 time.

25 During that time there, I was responsible --

1 I was their first-line supervisor, ensuring count was
2 conducted, conducted properly, ensuring that the
3 inmates were on task, present, accounted for. Some
4 paperwork I was responsible for.

5 Yeah, the overall job description is just
6 making sure that everyone, including myself and staff,
7 is safe and secure at all times.

8 Q So if there was an incident that would
9 arise, were you the first person of contact for your
10 subordinates?

11 A Yes.

12 Q Okay. All right. And just because I have
13 to put this on the record, I was seeing that you were
14 flipping through some papers. Can you tell me what
15 papers are in front of you?

16 A Yes. The incident report. It's a nervous
17 tick.

18 Q Gotcha.

19 A The incident report from Sindell, my
20 paperwork.

21 Q I totally understand that. I don't want to
22 make you feel nervous at all. I'm hoping this is just
23 going to be a relaxed conversation. Because it's not
24 my intention to try to go hard at anybody today or
25 anything like that. So --

1 A Understood.

2 Q All right. And so you left Macon State
3 Prison. Okay. So if you were there for nine years,
4 it was around 2019 then?

5 A I left in 2020, but I left just -- I started
6 at Macon State August the 2nd, 2010. My resignation
7 date from Macon State was March the 6th, 2020. So I
8 was like five months short of 10 years.

9 Q Okay. And what was your reason for
10 resigning?

11 A It wasn't safe anymore. It wasn't safe.
12 When -- when the warden got stabbed, I knew, you know,
13 staff didn't have a chance. We began to get -- that
14 was at the beginning when the Department of
15 Corrections officers were just leaving, leaving,
16 leaving. And I just didn't feel safe anymore.

17 Q So that was right around the start of the
18 pandemic. Did that have anything to do with any of
19 the tensions rising in the prisons?

20 A No. Actually, I was out on medical leave.
21 My mom had fell ill back in August and she was
22 homebound. So I was out on extended sick leave with
23 her. And so, of course, I'm reporting back to work
24 every week or every two weeks or whatever it was. And
25 when I heard that the warden had got stabbed, I just

1 turned in my resignation. You know, I'm not going
2 back out there.

3 Q Right.

4 A And it was like it was getting worse. Of
5 course, I would still get the phone calls and what was
6 going on and whatnot. So, no, I'm not going back out
7 there and put my life in jeopardy. If they don't care
8 anything about the warden, I don't stand a chance, you
9 know.

10 Q Right. Well, I'm sorry to hear about your
11 mom's extended illness. I hope she's doing better
12 now.

13 A No, my mom passed. My mom passed in '20.
14 She passed later that year.

15 Q I'm sorry. I lost mine in 2019. So I
16 understand.

17 A Thank you.

18 Q So can you tell me a little bit about what
19 happened with the warden? So he got stabbed. Did he
20 end up surviving that or --

21 A Yes, he did.

22 Q What happened?

23 A Well, what happened, the issue at Macon
24 State, the inmates were able to pop -- okay. The
25 inmates were able to pop themselves out of the door,

1 their cell doors. They were not secured. They were
2 secured, but they were -- they had figured out a way
3 to manipulate the locking mechanism to come outside of
4 the cell when they were not supposed to. So that was
5 a big issue.

6 Again, when I -- while I was there, those
7 last few months we began to lose staff. And the
8 lockdown units -- the lockdown units were usually
9 manned by males. But because it was a shortage of
10 males, females had began to work those lockdown posts.

11 And I'm not sure if you understand what that
12 means. That was more of a -- supposed to be the
13 highest of security areas. But like I said, because
14 there was a shortage of males, females were having to
15 work those.

16 Well, as a supervisor, I took it upon
17 myself. I would go and work those lockdown units. I
18 had more respect for -- other inmates had more respect
19 for me than they would just an officer. Right?

20 Well, as I'm in the -- as I'm in the
21 lockdown unit, this one inmate, he -- he just in so
22 many words just told me how he was going to rape me,
23 what he was going to do to me, all this other good
24 stuff. And so I -- for like 18 minutes, 18 minutes,
25 he was just going off. And the things that he was

1 saying, I was just writing stuff down as he was saying
2 it.

3 You know, he became just extremely
4 frustrated with me as I was writing down what he was
5 saying to me. Because, like I said, he could pop out
6 of his cell. So it's like a booth. Right? And it's
7 a glass booth that I'm in. He can't come in, but
8 there are flaps on each side of that booth that he
9 could lift up the lid and I could hear him very
10 clearly. So that's how I was able to hear what he was
11 saying.

12 Well, anyway, after he said all these things
13 to me, I went to -- and this warden, he was a new
14 warden. I went to him and I told him what had
15 happened with the inmate, all the things that he said.
16 And I felt I was ignored. I felt it wasn't taken
17 serious.

18 The next day, I remember the -- one of the
19 unit managers coming in and he went to that particular
20 cell and he just kind of like talked to the guy. And
21 inside of the guy's cell, when they opened the door,
22 the door was literally off the hinge. It's like if I
23 had came on this floor, this guy could have
24 potentially did whatever he wanted to do to me.

25 So when the unit manager there went in and

1 you're just talking to him and you see the door's off
2 the hinge, you see he's got all this stuff in his cell
3 to make weapons, like I said, I just felt like I
4 wasn't supported. I wasn't taken serious. So I filed
5 a complaint. I wrote the incident report. The warden
6 assured me that that inmate would be transferred to
7 another facility. And he never -- he was never --
8 okay. He was never transferred.

9 When I came back to work I think that
10 weekend or whatever it was and I asked the warden if
11 he had transferred the guy, I didn't get a response.
12 And so like I said, at this point I didn't feel safe
13 anymore. And that was -- that was -- that was then.

14 So I still worked the unit, but I would
15 never go on to the floor because I knew what had
16 already happened. Well, later on, the inmates -- and
17 this was sometime in July I want to say; I want to say
18 July -- the inmates literally took over the building.
19 They set the building on fire. They popped
20 sprinklers. We could see -- you know, this was at
21 nighttime. So we don't have as much security at night
22 as it is in the daytime. You could see the inmates
23 with machetes, cell phones, just stuff. Right?

24 The warden literally wanted to go in there
25 and talk to these guys. They had taken over the pod,

1 the dorm. I wasn't going in there. And I just knew
2 that this -- this man did not have the safety of his
3 employees at will. And I called my husband that night
4 and I asked him if I could -- if I could just -- you
5 know what? I'm done here. I quit. And he said,
6 well, yeah, come on home. But I didn't. I still came
7 to work.

8 This one inmate that I was telling about
9 that he said he was going to rape me, he finally had a
10 chance to see me again and his exact words to me was
11 I'm still going to take that P when I get a chance. I
12 said okay. My mom was going through what she was
13 going through. I couldn't get any support from the
14 staff. And I still had my own staff that I had to
15 worry about.

16 I got -- you know, the staff, they are not
17 the same. This new generation of kids, they were not
18 manageable in so many words. So I was frustrated with
19 that. I got my mama's business going on. I don't
20 feel supported by my supervisor. So that was -- when
21 my mom became ill, that take priority over all of that
22 crap.

23 So I went out with my mom. And that's what
24 I did. And while I'm home with her doing X, Y and Z,
25 of course, I've got to check in and give all the

1 updates of the status and when you're coming back and
2 all that other stuff. Well, those incidents that I
3 had described, these inmates are still popping out.
4 You know, of course, I still get the phone calls of
5 what's going on out here, inmates still popping out,
6 inmates won't lock down, people getting stabbed,
7 yadda, yadda, yadda. Okay. Well, you know, the
8 warden got stabbed. Oh, yeah? Is he okay? Yeah.
9 Okay. Good.

10 So I typed up a resignation and I packed up
11 all of my uniforms and I took them to the jail. I
12 took them to the prison. And that was it.

13 And so that was March the 6th that I did
14 that. It just so happened I'm looking at the news and
15 I see that two officers from the Houston County
16 Detention Center had been arrested. I said, well,
17 look, there's a position right there for me. So I
18 applied and I think I got -- I started, what, March
19 the 10th there. My hire date there was March the
20 10th.

21 Q So you had --

22 A Let me back up. Let me back up. It wasn't
23 March 6th that I heard about the -- the inmates [sic]
24 got fired. That was probably mid to late February
25 when I heard about that. And so when March 6th came,

1 I had already had the -- I think I already had the
2 hire date as March 10th with the detention center.
3 March 6th is when the warden got stabbed and that's
4 when I turned the resignation in there. So don't
5 quote me 100 percent on those dates.

6 Q I guess initially the -- or, essentially
7 what you're saying is that practically immediately
8 following your resignation with the Department of
9 Corrections, you then applied to Houston County; is
10 that right?

11 A No. I applied for it before my resignation.
12 I just didn't receive a hire date until -- March the
13 6th, that could have been the time I received the hire
14 date that I was officially hired. Because whenever --
15 I wasn't going to quit my job before I had another
16 one.

17 Q Right.

18 A But March 6th is when the warden got
19 stabbed. And that was in 2020.

20 Q Gotcha. Okay. And so then -- so then you
21 started sometime around March of 2020 with Houston
22 County?

23 A March 10th. March 10th.

24 Q Okay. And so with the Department of
25 Corrections, when you applied there to, you know,

1 become a corrections officer, did you have to go
2 through any sort of training --

3 A Yes.

4 Q -- in order to prepare you for that? Can
5 you tell me a little bit about that?

6 A It was BCOT up in Forsyth, Georgia. I had
7 never been in -- I had never been in law enforcement
8 ever, even in corrections. I had no experience with
9 that. So what basic correctional officer training
10 does is kind of like -- it teaches you how to manage
11 the inmates. It teaches you -- it kind of -- it's
12 like paramilitary style, but it teaches you
13 discipline, what to look for as far as the inmate's
14 behavior, use of force -- what do you call it -- fire
15 training.

16 Q You said fire training?

17 A Fire, fire safety, chemical -- it teaches
18 you, like, basic corrections, how -- how to live as an
19 inmate. Because we were assigned to live in the dorms
20 just like inmates are. And we were expected to have
21 our beds made every day, how to dress appropriately,
22 marching.

23 We were treated professionally as
24 correctional officers, but kind of sort of the way an
25 inmate -- how you expect inmates to behave. You know,

1 just kind of, like, wanting to give you that
2 experience so that when you're dealing with these
3 inmates, you're not mistreating them and so you can
4 see how it feels.

5 It's like they want you to experience how to
6 treat an inmate as if you were the inmate, standing in
7 line to get your dinner or your meal, how you're
8 expected to march, when to be quiet, how -- you know,
9 how to greet your superiors, stuff like that.

10 Q And you I think said it was BCOT?

11 A Yes.

12 Q Can you tell me what that stands for?

13 A Basic correctional officer training.

14 Q Okay. And so then you had to go through
15 training with Houston County; is that correct?

16 A That's correct.

17 Q All right. Can you tell me a little bit
18 about that training?

19 A That training is basic -- basic jail -- I
20 forget what they call it. It's jail school. And it's
21 pretty much the same thing without the marching and
22 the meals and whatnot. You know, it's not -- that
23 training is more like procedures for the jail. The
24 jail runs totally different from a prison. So that
25 was just like basic where the jail originated from,

1 who -- the sheriff, his deputies, what the deputy's
2 role is or what the roles are. The same thing. Use
3 of force. You got fire safety. I'm just trying to
4 name the different courses that's taught in jail
5 school.

6 Q Were you referred to as deputies? I'm
7 sorry. I didn't mean to cut you off.

8 A That's fine.

9 Q So jailers with Houston County, were they
10 referred to as deputies?

11 A Yes.

12 Q Okay. And I -- I would assume -- and
13 correct me if I'm wrong -- is there a difference in
14 the training that you get as a jailer as opposed to,
15 like, on-the-road type of deputy?

16 A I'm not sure because I've never been on the
17 road.

18 Q Gotcha. Okay. And then you said that it
19 was a little different from the Department of
20 Corrections training. Would you describe it more or
21 less intense, about the same, or how would you
22 describe it?

23 A Less intense.

24 Q Okay. Was it for a longer period of time?

25 A It's shorter.

1 Q Okay. How long did you have to go through
2 the Department of Corrections training?

3 A Four weeks.

4 Q Okay. And was the training for jail school
5 two weeks?

6 A Yes.

7 Q Okay. Are you still with the Houston County
8 Sheriff's Department at the jail?

9 A Yes.

10 Q What is your current position?

11 A Corporal.

12 Q When did you get promoted?

13 A March the 12th, I think, 2023.

14 Q A recent promotion?

15 A Yes.

16 Q Okay. And what are your duties now as a
17 corporal?

18 A Because I am still in training, right now
19 I'm -- I am shadowing supervisors. Right now I am
20 bouncing between intake and housing. Intake is
21 basically accepting, booking, intaking inmates,
22 assuring that their property -- when they come into
23 the facility, ensure that their property is accurate,
24 logging -- it's a lot of logging, making sure that
25 their arrest information is correct.

1 And in housing, I'm basically assisting each
2 deputy with their needs. Just making sure they have
3 everything that they need to get through the day.
4 Again, this is -- I'm recently promoted, so I'm still
5 in that training phase. I'm not -- I haven't been
6 independently taking any roles yet, if that makes
7 sense to you.

8 Q It does. And then whenever you say that you
9 were assisting each deputy with what they need, are
10 you meaning just the deputies that are in the jail?

11 A Yes.

12 Q Okay.

13 A The ones that are working my shift.

14 Q Okay. Do you still supervise the pods?

15 A Well, you supervise the pods as a deputy. I
16 go through and I do, like, a pod check for each pod
17 just to make sure that the inmates are on task, make
18 sure that they are following the procedures from the
19 jail. Again, I'm doing a lot of shadowing. At this
20 time, I'm not enforcing any rules because I'm still
21 learning what's expected. Even though I know how to
22 run a pod, I'm getting to know my staff and learning
23 their style before I actually go in and just, like --
24 I'm still learning is what I'm trying to say. I'm
25 still learning that.

1 Q But you -- but I guess my question is more
2 when you were just an entry-level deputy, you know,
3 working at the jail when you would just oversee
4 inmates in a pod, are you still doing that as well as
5 your supervising?

6 A No. No.

7 Q Okay. All right.

8 A Now, that's not to say that I can't do it.
9 It's just that I haven't done it yet simply because we
10 have been fully staffed. So I have just -- I haven't
11 had to do that yet.

12 Q Okay. Gotcha. And just to go a little bit
13 more into your background, do you have any military
14 background whatsoever?

15 A No.

16 Q Okay. And are you a member of any church or
17 any other organization?

18 A Yes.

19 Q Which organization?

20 A Which church?

21 Q Yes. If you attend a church and if you're a
22 member of a church, I would love the name of that.

23 A It's First Baptist. First Baptist Church in
24 Byron, Georgia.

25 Q Okay. And what about any other

1 organizations or clubs?

2 A No.

3 Q And do you have any hobbies that you like to
4 engage in with other people on a regular basis?

5 A No.

6 Q All right. What about legal history? Have
7 you ever -- you've already said that you haven't
8 testified in court before. But have you ever been a
9 party to any other lawsuit?

10 A No.

11 Q What about any bankruptcy?

12 A Yes.

13 Q When were you -- when did you do bankruptcy?

14 A I don't know when it began, but I was
15 discharged in 2017.

16 Q And have you ever been arrested for a crime?

17 A Yes.

18 Q When were you arrested?

19 A 2004 probably.

20 Q Do you remember what agency it was?

21 A Fort Valley Police Department.

22 Q Fort Valley?

23 A Warner Robins. It was a lot of traffic
24 violations. Fort Valley Police Department, Warner
25 Robins Police Department.

1 Q So are these two separate occasions or is it
2 possible that --

3 A Yes.

4 Q Okay.

5 A No, two separate occasions.

6 Q Both occurred in 2004?

7 A No, no, no. I can't tell you what year they
8 occurred in. But I'm just telling you, yes, I have
9 and which agencies.

10 Q All right. And then the Fort Valley, you
11 said it was for traffic stuff?

12 A It was -- all of it was traffic violations.
13 I think -- well, I want to say in 2003, maybe 2004, I
14 got a DUI.

15 Q Was that the Fort Valley?

16 A Huh?

17 Q Was that the Fort Valley?

18 A Huh-uh. That was Centerville. I guess that
19 was Centerville.

20 Q Okay.

21 A And then -- I can't -- I can't remember
22 exactly, but a lot -- but from that DUI and then my
23 license were suspended, but I didn't know that. I had
24 to get a driver's permit and whatnot. So it was just,
25 like, driving without a valid license or driving

1 without a license. Some of it was insurance stuff.
2 It was just a lot of different -- like I say, all of
3 it was traffic violation.

4 Q But just one DUI; is that right?

5 A That's correct.

6 Q Okay. And just those three times were the
7 times that you were arrested?

8 A I don't know how many times it was, but it
9 was -- it was nerve wracking for that period until I
10 figured out what was going on, but yeah.

11 Q Okay. And do you know how those cases were
12 resolved?

13 A I was found guilty on the DUI and I had to
14 do the risk reduction class, my one-year probation,
15 whatever comes along with that DUI stuff. That was
16 that. The driving without the insurance and stuff, of
17 course, I was guilty on that. But all those fines
18 were paid out. A couple of those cases were -- a
19 couple of those cases were dismissed or something.

20 I can't remember what happened with all of
21 them. But I do still have my police reports. If you
22 give me a minute, if you really need them, I can go
23 get them. Because I've got that information.

24 Q Yeah. If you could get this to your
25 attorney later today and he can send it over to me,

1 that would be fine.

2 A Okay.

3 Q Let's see. All right. Any other arrests
4 that we haven't already covered?

5 A Not that I can remember.

6 Q Okay. So I guess let's go back to your work
7 history. We talked about the Department of
8 Corrections and Houston County Jail. Have you ever
9 had any sort of complaints that were filed against
10 you, whether it be by inmates or coworkers or
11 supervisors or anything like that?

12 A Yes.

13 Q Okay. Do you know how many times?

14 A How many times? With inmates?

15 Q I would imagine inmates complain a lot.

16 A A lot of those. I get a lot of those.

17 Q Is that between the two jobs or do you --
18 can you give me, like, an estimation for the
19 Department of Corrections as well as an estimation for
20 the Houston County Jail?

21 A Out of 13 years in corrections, well over
22 100. Easily over 100.

23 Q And that's between the two agencies; right?

24 A That's correct.

25 Q All right. What about any complaints by any

1 coworkers?

2 A I've had a few of those. How many, I don't
3 know. But, yes, a few.

4 Q What were the nature of those types of
5 complaints?

6 A I didn't support them. One lady, she said I
7 was picking on her. One said I pointed a pepper-ball
8 gun at her.

9 Q A what gun?

10 A A pepper-ball gun.

11 Q Can you describe what that is?

12 A Huh?

13 Q Can you describe what that is?

14 A It's a gun that -- it's like a gun about
15 maybe two feet long and the rounds are the round
16 pepper balls and you load the gun with the pepper
17 balls. So she said I pointed that gun at her.

18 I got a lot of complaints for -- because I
19 did not -- if I didn't do what they wanted me to do as
20 far as if the inmates -- and mind you, I'm a
21 supervisor at this point -- if an inmate did something
22 to them and I did not lock the inmate up or whatnot,
23 then that's a complaint. I'm siding with the inmates.
24 If the inmates masturbated on them and I didn't lock
25 the inmate up, I mean, that was a complaint. The

1 pepper-ball gun, I don't even know how that come
2 about, but that was a complaint.

3 I cussed this one lady -- one laid said that
4 I cussed her out leaving out of the parking lot. I
5 was in my car. She was in her car. She was coming
6 into the parking lot. She said I cussed her out. And
7 when -- that was -- that was a big deal. And it was
8 asked how did I cuss her out. Well, she said that
9 Sergeant Coach was in her car -- she was in her car.
10 Her lips were moving. But I know she didn't say
11 hello. So that was a complaint.

12 One lady said that I cussed her out because
13 she asked me for some food. And when I told her that
14 I was going to file a complaint against her for
15 defamation of character, she changed her statement.

16 I'm trying to think what else. One lady got
17 mad because they asked all the supervisors to
18 participate in some kind of drive and I told her, no,
19 I wasn't going to do it. So that was a -- that was
20 another thing that I don't support them.

21 That's just what people do. That's all.
22 Those are the complaints that I can just remember off
23 the top of my head. Have there been many? Yes.

24 Q And then the nature of the complaints by
25 inmates, what type of complaints would those be?

1 A I didn't let them out of their -- at the
2 jail -- at the prison -- I don't know. They
3 complained about everything. If I don't let them get
4 two trays, if I don't let them go out -- like, if I
5 don't let them go to another building to talk with
6 their friends or go and do whatever they want to do,
7 that's a complaint. If I didn't give them what they
8 wanted when they wanted it, that would be a complaint.

9 If I had -- say, for instance, when I was an
10 officer and they had these snacks that they would get
11 at night. Well, I pass them out when I get time to
12 pass them out, not when they want me to. So they
13 would tell that I would hold their snacks all night.
14 Sometimes snacks wouldn't even get there.

15 Everything in prison is like repetition.
16 Just because they got it at 7:30 yesterday and the day
17 before, that doesn't mean they're going to get it at
18 7:30 the next day. So if they were not there -- I
19 didn't have to tell them whether they were there or
20 not. When I get them, I give them to you. That would
21 be a thing, that I'm holding snacks and wouldn't give
22 it to them. Meals. If I didn't pass the meal out
23 immediately when I get to work, that would be a
24 complaint. Just inmate stuff.

25 And at the jail -- okay. At this jail, I'm

1 a racist, whether I'm a racist for black people,
2 whether I'm a racist for a white person. That's just
3 the thing. I'm a racist. If I choose two -- and I
4 did try to choose two males -- two white males, two
5 black males. I try to do two and two, black and
6 white. Sometimes they're not up and ready to go. So
7 whoever's up and ready to go, that's who come out.
8 You know, it might be four black people. It might be
9 three whites and one black. I don't care about that.
10 Just come and do it.

11 So the complaint -- if I have three white
12 men and one black, I don't like black people. I like
13 white people. If I have three black men and one
14 white, I'm a racist against white people. So that's
15 always a thing.

16 I get complaints about not -- not letting
17 them sell trays and pass trays off. I get that. I
18 get complaints about -- or, I got complaints about
19 going into their cells every day. Why am I the only
20 person I'm going into their cells every day.

21 I've got some complaints that I cuss -- I
22 cuss them out, cuss the pod out, that I locked the
23 whole pod down for no reason. I get a number of
24 complaints. I'm trying to think of some of the
25 complaints from the females. Some of the complaints

1 from the females is I'm a racist. I don't know. But
2 I get a lot of them.

3 Q Do you know how many of the ones that you --
4 how many of the complaints that you received, how many
5 of them have been substantiated?

6 A I really don't know how many -- how many
7 have been because they ask me to respond to the
8 grievances once I get them. I respond to them, but I
9 never hear anything else from them.

10 Q Well, now that you are a corporal with
11 Houston County, would it be policy to go and follow up
12 with a deputy if, say, a complaint had been
13 substantiated?

14 A Yes.

15 Q Okay. So it's -- so I guess then let me ask
16 you this. So to your knowledge, do you think anything
17 has ever come about any of them? Like, if your
18 supervisors are following that policy, has anything
19 ever come about with the complaints that have been
20 filed against with you Houston County?

21 A This is the only complaint that has been
22 this depth.

23 Q You mean with litigation?

24 A Excuse me?

25 Q You mean with litigation; correct?

1 A Yes.

2 Q Okay. Did anybody ever follow up with you
3 regarding the incident afterwards?

4 A Afterwards of what? Which incident?

5 Q So, I mean, I guess the incident for what
6 we're here for today -- we'll get a little bit into
7 that later on -- with Mr. Sindell. Was there a
8 complaint that was filed against you on that one?

9 A Yes.

10 Q And did you give an interview for it?

11 A Did I give what now?

12 Q Did you give an interview for it?

13 A Yes.

14 Q Did you write a report about it?

15 A Yes.

16 Q Did anybody ever come and tell you what the
17 disposition of this complaint was after the
18 investigation ended?

19 A No. Not after the fact. And like I said,
20 I'm just now getting familiar with all that was going
21 on that was taking place from this incident. I'm glad
22 it did, because I didn't know it was going to come to
23 this right here. But I didn't receive this stuff
24 until last year, until last year July. Last year I
25 received this stuff right here.

1 Q And I assume then you probably had to
2 refamiliarize yourself with the whole incident; is
3 that right?

4 A That's correct.

5 Q Okay. So have you ever received any sort of
6 informal reprimands?

7 A Informal reprimands?

8 Q Right. Like, someone had to have a talking
9 about -- you know, say like they found out a rule or a
10 policy had been violated, so they just had like a
11 one-on-one conversation with you, something like that.

12 A Regarding this incident, yes. It was the
13 body camera, turning the body camera on whenever you
14 have -- whenever I conduct a shakedown or whenever
15 there's an issue that arise.

16 Q Is that -- is that the incident with what
17 happened in L pod or was it the incident that happened
18 in the -- in Mr. Sindell's cell like a day or two
19 prior to that?

20 A This is -- and like I said, I can't -- I
21 can't recall exact dates or exact -- exact incidents,
22 but whatever it was, whenever all this stuff with
23 Sindell came about, I was pulled in the office and
24 given a letter of counseling regarding wearing the --
25 wearing the body cam at all times, wearing the body

1 cam and using it all the time.

2 Q Is that the only formal reprimand that
3 you've gotten?

4 A Yes.

5 Q Okay. And is that just with Houston County
6 or would there have been any formal reprimands with
7 the Department of Corrections as well?

8 A Well, I have one reprimand. Well, it was --
9 yeah, it's still a letter of counseling. And it was
10 during a use of force with an inmate. The inmate --
11 oh, my God. I can't even remember the details of that
12 situation. But it was the inmate came out of his
13 cell, refused to lock down. He was sprayed by -- he
14 was sprayed by somebody with -- and that was when I
15 was first promoted to sergeant. He was sprayed with
16 pepper spray by somebody. And we had -- he had a cast
17 on his arm and us trying to handcuff him and he had
18 feces covering his -- he had feces over his body.

19 And the reprimand then became -- I can't
20 even -- give me a minute to think about that one. The
21 guy came out of his cell. Huh-uh. His hand -- his
22 arm was in the flap. He refused to move his arm out
23 of the flap. He was sprayed. Well, after he was
24 immediately sprayed, he had to be taken out to the
25 shower to be decontaminated.

1 He was put in the shower by my lieutenant.
2 The lieutenant did not secure the door to the shower.
3 So he -- the inmate was able to come back out. And
4 when he came back out, he ran on the top range. And
5 it was a lot of tussling trying to get him handcuffed
6 and back into the cell. So that was the use of force
7 there that was a letter of concern -- letter of
8 counseling there. Like I say, I -- if you need it, I
9 can -- I should still have the --

10 Q Paperwork?

11 A Uh-huh. Because I don't -- I never threw it
12 away. I've just got to look for it. Let me just
13 write this down that I need to get -- I can get to my
14 lawyer a copy of that written report from the Sindell
15 case, what was written. I can get that.

16 Q Yeah. I think that he's handed over
17 everything regarding the incident with Mr. Sindell.
18 What would be interesting to look at, though, is the
19 counseling letter that you got with the Department of
20 Corrections with this one inmate. I would like to see
21 that. So if you have a copy of that you can send to
22 him, that's fine. If not, I can see if I can request
23 it another way.

24 So we've been going for about an hour. I
25 know that earlier I mentioned that if you needed a

1 break, you can let me know. But usually I like to
2 give the opportunity after we go about an hour to see
3 if you are wanting a break at this time.

4 A I'm good.

5 Q Okay. So we'll continue if that's good with
6 everyone. So the incident that we just talked about
7 with the Department of Corrections with the inmate
8 with the cast on his arm, is that the only time that
9 you've been reprimanded for use of force?

10 A That I can think of, yeah.

11 Q Okay. And we did talk a little bit about
12 the use-of-force training, you know, that you had to
13 undergo with the Department of Corrections and with
14 Houston County. So can you tell me a little bit about
15 the use-of-force training that you received from --
16 from both of those jobs and I guess if they
17 differentiated at all?

18 A I'm not sure exactly what you're asking. So
19 if you -- I'm not sure. Because it's a lot of
20 information and I don't want to just talk in circles.
21 So if you'd just ask me -- I don't know how to say
22 that. I'm not trying to tell you what to do.

23 Q I can get more specific if needed.

24 A Huh?

25 Q I can get more specific with questions if

1 needed.

2 A Yes, please.

3 Q So the use-of-force training -- first of
4 all, how long is the use-of-force training with the
5 Department of Corrections?

6 A It's eight hours -- in Houston County, it's
7 an eight-hour course. In GDC, it's a one-week course.

8 Q Were the -- okay. So obviously Department
9 of Corrections was a little longer than Houston
10 County. But were they substantially the same?

11 A No. Because they use different tools. You
12 use different devices. The Department of Corrections
13 don't offer the -- does not offer the same devices
14 that -- I mean, Houston County does not offer the same
15 devices that GDC does.

16 Q By devices, do you mean weapons?

17 A Weapons.

18 Q Okay. What's the difference between the --
19 what you can use with the Department of Corrections as
20 opposed to Houston County?

21 A Again, it goes back -- you have a
22 pepper-ball gun, OC spray. We have -- it's a lot of
23 stuff I don't even know the names of them, but there
24 are different weapons that you can use there as
25 opposed to -- they don't offer that stuff in jail.

1 You know, we're just now getting to OC spray at the
2 jail. So it's just different training.

3 Q So whenever you were with the Department of
4 Corrections, during that one-week course, did they
5 actually train you how to use those weapons?

6 A Not -- yeah. Yes. Yes. Some of the
7 weapons. But, again, whatever weapon you use --
8 whatever weapon you use, you will have to have that
9 done to you. Let me explain. If I carry a taser, I
10 had to be tased. If I shot a pepper-ball gun, I had
11 to be shot with a pepper-ball gun. If I used a
12 bandit, then I would have to be struck by a bandit.

13 And I never -- even though I had the course,
14 I never -- I was never certified because I never had
15 the bandit used on me. The grenades, even though we
16 had them, I never used them. It would be like
17 somebody that was above me that would use those items,
18 those weapons. Because I didn't have -- even though I
19 had the use-of-force class, I didn't have the physical
20 training, if that makes sense to you.

21 Q It does make sense. So which weapons did
22 you have training with, the physical training?

23 A A taser, OC spray, pepper-ball gun.

24 Q All of which you did not have with Houston
25 County; correct?

1 A The taser, yes, I did. And because -- they
2 have not offered OC spray yet. Pepper-ball gun at
3 Houston County, no. So no for the OC spray and no for
4 the pepper-ball gun.

5 Q Okay. And what about, were you ever -- did
6 you ever go over any sort of pyramid of what level of
7 force is acceptable to use in a certain situation?

8 A A pyramid? You're talking about where if
9 this didn't work, I use this right here? Is that what
10 you're asking?

11 Q So I guess you can -- yeah, we can go with
12 that. Specifically what I am interested to know is
13 how do you know when to elevate the level of force?

14 A I never had to.

15 Q Were you -- were you trained on it, though?

16 A Yes. But I can't remember what is what. I
17 really can't.

18 Q Okay. So are you -- does Houston County
19 have ongoing training in order to keep the deputies'
20 memories fresh as part of what the policies are?

21 A Yes. Yes.

22 Q How much ongoing training do they get?

23 A We get training every four months.

24 Q All right. And do you go over the same
25 information during this training?

1 MR. WAYMIRE: Object to form.

2 THE WITNESS: Excuse me?

3 MR. WAYMIRE: You can answer. You can
4 answer. I'm just objecting to a question that I
5 think is vague.

6 MS. BURTON: I can clarify it.

7 BY MS. BURTON:

8 Q So you have your initial use-of-force
9 training. And then you say that you have ongoing
10 training every four months. So the training that you
11 undergo every four months, is that the same or is it
12 similar to the training that you get whenever you
13 initially go through your jail training?

14 A Are you speaking of the topics of training?

15 Q The use-of-force training specifically.

16 A No. The use-of-force training, I don't -- I
17 really don't know -- and I hate to say this -- the
18 trainings are not all the same. The trainings are
19 covered yearly, but they're different topics for each
20 of the -- okay. So this four months, the first four
21 months might -- the first quarter might be
22 deescalation tactics and -- I don't know -- something
23 else. The next one might be use of force. The next
24 one might be new procedures. I don't know. The
25 topics are always different.

1 Q Do you ever go back and review what the
2 policies are as far as the use of force goes?

3 A As needed, yes.

4 Q Okay. And is that covered in the training
5 that you get every four months, the review?

6 A The review? What do you mean, is it
7 covered?

8 Q So, for example, I used to be a teacher.
9 And so, you know, I used to teach Spanish. And so
10 every single day that we'd come in, I'd briefly go
11 over what we went into the last class so that way we
12 could build upon what we learned previously.

13 So do you have that type of thing as far as
14 use of force when you go and get your training every
15 four months, that you briefly touch on what you've
16 gone over already so you can build on it?

17 A No, because they're different subject
18 matters. They're different subjects. So if you've
19 already completed -- you have an eight-hour day to
20 cover this material. So you don't revisit what you --
21 you don't revisit what you've done the last quarter.
22 You move on to your next subject, if that's what
23 you're asking.

24 Q That is exactly what I'm asking. Thank you
25 for clarifying it. So then how do you remember

1 essentially when you are able to use physical force
2 against an inmate if you're not reviewing it?

3 A Okay. So you have to take it upon yourself
4 to read the policy. Read the policy and, of course,
5 when there is a situation that happens, if there's a
6 situation that happens and we do go back and watch the
7 videos to see what we did -- what that person did
8 wrong or what that person did right, how the situation
9 could have been handled differently when an incident
10 do occur.

11 Q Okay. And how often do you personally take
12 it upon yourself to go back and review policies?

13 A As needed. I mean, I go through and I read
14 the policy because I want to make sure I'm using --
15 okay. The policy that I'll focus on is this taser.
16 Because I want to make sure that I'm doing the right
17 thing as far as the taser. So I focus a lot on that
18 one. That's just me. Just last week, they changed
19 the taser policy. So now I've got to become familiar
20 with the new policy. I mean, I've printed it out
21 already. I just haven't had a chance to read it
22 because I'm getting ready for this.

23 Q So then if you're doing it on an as-needed
24 basis, do you feel that you are, I guess -- are you
25 adequately prepared each day whenever you go in and

1 there could be a potential situation?

2 A I feel that I am.

3 Q What about your colleagues? Do you -- do
4 you think personally as you observe your colleagues
5 that they're reviewing the use of force?

6 A I haven't -- I haven't been observing my
7 colleagues use a -- I mean, again, the people -- let
8 me -- let me try to paint a good picture for you. If
9 I'm -- I've recently become -- I've recently become a
10 supervisor. I haven't had many interactions with
11 movement calls and that's when a deputy needs
12 assistance somewhere else.

13 I've been in a pod. I've been in a pod with
14 the inmates. So I have not been able to just leave my
15 pod to go and assist. So I don't see what everybody
16 else does. What I see is Monday morning
17 quarterbacking after the event has happened and I'm
18 just watching a video without sound. So I don't know
19 what the situations are. So I can't answer your
20 question because I'm not there and I don't know
21 what --

22 Q Right. And that's fair. You know, I'm only
23 asking what your personal knowledge is, what you
24 observe.

25 A Right.

1 Q I don't want you to speculate at all about
2 what anybody else is doing. Anything that you tell
3 me, I don't want it to be guesswork. I want it to be
4 true. So I appreciate you being candid with that.

5 Okay. Let's move on a little bit to the
6 body camera policy. Can you tell me what the policy
7 is with Houston County as far as the use of body
8 cameras?

9 A Okay. So everyone is issued a body camera.
10 Your body camera is supposed to be worn at all times.
11 Your body camera is active when there is an incident.
12 I cannot specifically tell you what that body camera
13 incident is. But it has been enforced, especially
14 since we received these new cameras, wear your body
15 camera at all times.

16 These new body cameras are really good,
17 because, say, for instance, if there is an incident
18 and when I activate it, it will give me 30 seconds
19 prior to the incident. So you can see what led up to
20 the incident. So do I -- I'm not very familiar with
21 the use of force -- excuse me, not use of force -- I'm
22 not very familiar with the policy regarding the body
23 camera. I just know to wear the body camera at all
24 times and activate it when there's a situation.

25 Q Okay. And you said that you guys recently

1 got new body cameras. Do you know when those new body
2 cams were issued?

3 A I do not.

4 Q Was it within the last year?

5 A It was more -- it was more than the last
6 year. But I can't tell you the exact date.

7 Q Okay. Fair enough. Do you know if these
8 are the same body cameras that were issued when the
9 incident happened with Mr. Sindell?

10 A Absolutely not.

11 Q Okay. So those were the old body cameras?

12 A The one with the Sindell issue, those were
13 the old body cameras.

14 Q Did those body cameras whenever you activate
15 them go back 30 seconds?

16 A No.

17 Q Okay. I guess it's very useful to have the
18 new ones then, isn't it?

19 A Very useful.

20 Q All right. To your knowledge -- because
21 we've gone over the use-of-force training and we've
22 gone over -- and the use of force policies and the
23 body camera policy. To your knowledge, have you ever
24 violated either one of those policies?

25 A Not to my knowledge.

1 Q Okay. Has anybody ever accused you of
2 violating any of those policies?

3 A And when you say violate, what do you mean,
4 violate?

5 Q So, for instance, you are supposed to have a
6 body camera on when an incident occurs and you're
7 supposed to activate it when an incident occurs.

8 A Yes. Yes. Okay. Well, yes, I have
9 violated.

10 Q Okay. How often have you violated that
11 policy?

12 A Prior to the new cameras or the old cameras?

13 Q I would just say in general since you've
14 been working.

15 A In general -- and so the old cameras, they
16 did not have a good battery lifespan. If I ran -- if
17 I ran that camera at every incident, the battery --
18 the camera would die two or three hours into the work
19 shift. So the battery lifespan on that old camera was
20 no good. So when -- it was like -- that was the
21 reprimand. When you're shaking down these cells make
22 sure you're running your body camera.

23 Q What do you mean by shaking down the cells?

24 A Cell checks, go and conduct -- are you
25 familiar with the cell check? Do you know what that

1 is?

2 Q I think I understand what it is, but for
3 purposes of the record, you can explain that?

4 A Okay. A cell check, you go in and literally
5 check the cell. And the jail term for it is
6 shakedown.

7 Q And when you're -- so when you're checking a
8 cell, are you checking for things like contraband?

9 A Yes.

10 Q Anything else that you're looking for
11 whenever you do these shakedowns?

12 A Anything they're not supposed to have in
13 their possession.

14 Q And how often were you supposed to do
15 shakedowns?

16 A It's not how often. We do shakedowns daily
17 and we were -- we are -- we're supposed to do three
18 cells -- a minimum of three cells a day. There's no
19 specific time, but we're supposed to do three cells a
20 day.

21 Q Is there any specific reason to pick one
22 cell over another?

23 A Me personally or anybody else?

24 Q Well, I guess, with your practice of doing
25 the cell checks, is there any reason why you would

1 pick one cell over a different cell?

2 A No. Because I'm going to check all of them.

3 Q So whenever you would do -- was it your
4 practice to check -- like, try to check all of the
5 cells that were in your pod?

6 A Yes. If time permitted, yes. Yes. If time
7 permitted and -- I would. If I had the time, which I
8 did most of the time. If I had the time to check
9 every cell, I checked every cell.

10 Q How many -- because you were over L pod;
11 correct?

12 A At the time of that incident. But I've been
13 over every pod. I've been in every pod.

14 Q On average how many cells does each pod
15 have?

16 A Forty.

17 Q And how long does a shakedown usually take
18 per cell?

19 A Okay. So this is in 2020 when this -- when
20 it was easier to shakedown the whole pod. I'll just
21 give you a background. The pod holds at least 80
22 people. Okay? During COVID, the maximum number of
23 inmates that were in the pod, it did not exceed 50
24 inmates. Okay? So there were fewer cells to check,
25 if that makes sense to you. So it was easier then to

1 go into every cell because there were not that many
2 inmates. So if you had 20 on the top and 17, 18 on
3 the bottom, and it's one person in each cell, it's
4 easy to conduct a shakedown for that number of people.

5 Now, with the numbers being 71, 85, no, I'm
6 not -- I don't have time to shakedown that many
7 people. Right? So if time permits, I would do only
8 one tier. So I just want you -- I wanted to paint a
9 picture to you as to why I was able to shakedown the
10 whole pod because there were fewer people.

11 Q So by tier, do you mean like top level and
12 bottom level?

13 A Yes.

14 Q Okay. That's very helpful. Thank you.
15 Okay. So then -- so we talked about the body camera
16 stuff. Have you ever been found to be in violation of
17 the use-of-force policies?

18 A No.

19 Q Okay.

20 A Not to my -- the only -- and that wasn't a
21 violation. It's just -- I don't know. I can't
22 remember the details and I'm not going to get into
23 that one from Macon State. But as far as in Houston
24 County, no.

25 Q The one that you just referred to as far as

1 Macon State Prison goes, is that the one with the guy
2 with the cast on that you're referring to?

3 A Yes. Yes.

4 Q Okay. And then what about your colleagues?
5 Have you ever witnessed them violating any
6 use-of-force policies in your opinion?

7 A No. Because, again I state, I was in my own
8 pod. I don't go to that stuff because I'm in my pod.
9 I can't leave my pod to go to another incident.

10 Q And so whenever you called people to come in
11 and assist you with inmates, have you ever witnessed
12 them become excessive with their physical force
13 against inmates?

14 A The computer screen stopped for a second.
15 Repeat that question please.

16 Q So whenever you called other people in to
17 assist you with situations, have you ever witnessed
18 any of those colleagues using excessive force with
19 inmates?

20 A Not in my opinion.

21 Q Okay. All right. So we're going to talk a
22 little bit about the incident of the day in question.
23 Do you understand that by the incident I'm referring
24 to what occurred with Mr. Sindell getting slammed to
25 the ground on or about June 30th of 2020?

1 A Okay.

2 MR. WAYMIRE: Object to form.

3 MS. BURTON: Okay.

4 MR. WAYMIRE: Before we get into all that,
5 can we take a brief break?

6 MS. BURTON: Absolutely. Do you want to
7 take a five or 10?

8 MR. WAYMIRE: Five is good enough for me.

9 BY MS. BURTON:

10 Q What about you, Ms. Coach? Are you good
11 with a five-minute break?

12 A I would like 10 please. Let me go and check
13 and see what my daughter is talking about.

14 Q All right. We'll see you in 10 minutes.

15 A All right. Thank you.

16 (Whereupon, a recess was taken from 11:19
17 a.m. until 11:30 a.m.)

18 BY MS. BURTON:

19 Q Okay. So right before we took a break, we
20 were about to get into the incident with Mr. Sindell
21 that occurred on or about June 30th of 2020. Do you
22 understand what incident I'm referring to?

23 A Yes.

24 Q Okay. Can you describe that incident?

25 A Well, he was asked -- nope, nope, nope.

1 Earlier that day I had conducted a cell check in his
2 cell. Whatever possession of contraband he was in --
3 I mean, according to the video, I think it was books,
4 extra books that he had. He lost rec time by being in
5 possession of contraband. And when rec began, they
6 start -- the inmates that were locked down for
7 possession of contraband were ringing the bell so they
8 can come out of their cells. And I didn't let them
9 out.

10 When I answered his bell -- his buzzer, it
11 was something about he didn't care nothing about -- he
12 didn't give them -- whatever it was he said about
13 break. He just needed some tissue. Well, I opened
14 the door for the -- I tossed the tissue to the pod
15 worker and the pod worker was to give him the tissue.
16 He brushed past the pod worker and went to the kiosk.

17 When he went to the kiosk, I told him a
18 couple times to go back to his cell. He refused to go
19 back into the cell and proceeded to use the kiosk. At
20 that time, he was no immediate threat to anyone, so
21 everybody and everything was calm. I locked the
22 entire pod down because I knew he wasn't going back
23 into the cell. At the same time, if, in fact, he did
24 not go back into the cell, when movement came, they
25 would know who was the person that the movement call

1 was for.

2 So I locked the pod down and I told the
3 other inmates, you know, that had nothing to do with
4 them. I was locking the pod down. They complied.
5 They went in their cell.

6 Well, after everybody went into their cell,
7 Deputy Cleckner and Deputy Boerger were the first two
8 to come into the pod. The floor is clear with the
9 exception of Sindell. He walked towards Cleckner. I
10 mean, I can hear -- I can see -- on the video, I can
11 hear Cleckner telling him to lock down. He just
12 refused to lock down.

13 So when he refused to lock down, he was
14 taken to the floor. And like I said, all of that is
15 very -- very vague. I'm just thinking -- I'm just
16 looking at the video. I'm going off of the video that
17 I saw from the incident. And that was my first time
18 seeing the video in, what, three years or almost three
19 years.

20 Q Do you remember why you had put everybody on
21 lockdown?

22 A Yes. Because they were in possession of
23 contraband during a cell search.

24 Q By they, who do you mean?

25 A Whoever they were. The inmates.

1 Q All of them?

2 MR. WAYMIRE: Could I just interject here?
3 There are two, I think, lockdowns and that's the
4 confusion of the question. One is locking people
5 down for contraband. The other is the lockdown
6 that happens when Sindell comes out of his cell.

7 THE WITNESS: Okay. Okay. Okay. So let
8 me -- let me make it clear. Rec time is from
9 2:00 o'clock until 4:30. Okay? If an inmate --
10 okay. Let me -- let me paint a picture from top
11 to bottom for you so you can get a clear
12 understanding of what's going on. Because what's
13 going to happen, you're going to ask me questions
14 and you're not going to know what I'm a talking
15 about.

16 Okay. So lockdown. The inmates come
17 outside of their cells on first shift twice a
18 day. From 8:00 clock in the morning until 11:30
19 is their rec time. At 6:00 o'clock in the
20 morning until 8:00, the inmates are on lockdown.
21 They don't come outside of their cells. Okay?

22 At 11:30, the entire jail is locked down
23 because there's no movement. And when I mean
24 movement, there's no inmate activity unless it's
25 medical or something that they need to do

1 individually. Okay?

2 The inmates then are allowed to have rec
3 again from 2:00 o'clock until 4:30. At 4:30, the
4 jail is locked down again. Okay. So that's one
5 lockdown. Are you with me on that one?

6 BY MS. BURTON:

7 Q Yes.

8 A Okay. So whenever there's a rule violation,
9 the inmate losses rec time for that rule violation.

10 Q Uh-huh.

11 A So that could be -- it depends on when the
12 incident happened. If the inmate has lost rec for any
13 other violation before that rec time has started, he
14 will loose rec time. And that the officer's
15 discretion. When I conduct the cell search and any
16 rule violation, which is possession of contraband or
17 if they're disrespecting me, if they're fighting,
18 whatever that rule violation is, they lose rec time.

19 So when I say lockdown, that means go lock
20 down in your room. So when I gave Sindell the
21 instructions go lock down in your cell, that means go
22 in your cell and lock down. Does that answer your
23 question?

24 Q Yes. It does. So then when you -- so do
25 you remember approximately what time the incident

1 occurred with him at the kiosk?

2 A So I'm reading my report here. I read
3 somewhere -- and probably not in incident report, but
4 I saw somewhere where the approximate time was about
5 2:07. 14:07.

6 Q So would that have been during the
7 recreation time?

8 A That would be during the recreation time.

9 Q And that is approximately the time that you
10 put the entire pod on lockdown; right?

11 A And so -- yeah. Approximately.
12 Approximately.

13 Q Okay. And then the purpose for -- just to
14 make it clear on the record, the purpose for the
15 lockdown was what?

16 A The purpose to lock down the entire pod?

17 Q Yes.

18 A Well -- okay. So here's the deal. The top
19 tier was already locked down because they don't -- all
20 inmates don't come out at the same time. Okay? They
21 come out by tier. Remember I just explained to you
22 there are two different rec times; right? They
23 alternate between the rec times. You've got the top
24 tier. You've got the bottom tier. Okay?

25 And this is for example. On Monday, the top

1 tier will come out at 8:00 o'clock in the morning.

2 The bottom tier will come out at 2:00 o'clock in the
3 evening. At nighttime on the second shift, the top
4 tier will come back out again at 8:00 o'clock p.m.

5 Okay. On Tuesday, whichever tier came out
6 last the night before, they don't come out at
7 8:00 o'clock in the morning. They will come out --
8 the opposite tier will come out at 8:00 o'clock, so
9 they rotate. They alternate by the day. Are you with
10 me?

11 Q I am.

12 A So this particular day, only the -- the top
13 tier was already locked down. The bottom tier was the
14 only tier that was out. So when I instructed everyone
15 to lock down, the top tier was already locked down.
16 So only the bottom tier had to go inside of their
17 cells. Are you -- we're clear on that; right?

18 Q We are clear on that, yes.

19 A Okay. So the purpose for locking the
20 remaining of the bottom tier down is because Sindell
21 was instructed to return to his cell, to lock down in
22 his cell and he had refused to comply. So there would
23 be no issues with who was the person to have violated
24 the rule, I had to -- I locked the whole tier down and
25 Sindell would be the only person that was out there

1 once movement entered the pod.

2 Q So then I have a question about that.
3 Because did you -- did you say that Mr. Sindell had
4 lost his rec time that day because of the contraband?

5 A Yes. I -- yes.

6 Q Okay. So if he's on lockdown when -- well,
7 first, let me back up. Do you recall if it was his
8 tier that was supposed to be out during rec at that
9 time?

10 A At 2:00 o'clock, the bottom tier, which was
11 his tier, was supposed to be out on the afternoon
12 break.

13 Q Okay. And then was his cell unlocked for
14 whatever reason for him to be able to come out at
15 2:00 o'clock whenever he was not supposed to be out
16 there?

17 A His cell was unlocked because he asked for
18 tissue.

19 Q Okay. And so immediately after receiving
20 the tissue, is that whenever he left the pod?

21 A That's when he left the cell.

22 Q The cell, yes. Okay. And did he walk
23 immediately over to the kiosk?

24 A Yes.

25 Q And do you know why he was at the kiosk?

1 A He was sending -- I don't know why he was at
2 the kiosk, but I saw the message that he was sending
3 in this case.

4 Q Okay. So what was the -- so he was sending
5 a message at the kiosk then; is that right?

6 A According to the documents that was sent to
7 me, he was sending a message.

8 Q Okay. Who was he sending a message to?

9 A I'm not sure.

10 Q Do you know what the message entailed?

11 A I'm not sure. I just know he was sending a
12 message.

13 Q Okay. So it could have been to family or it
14 could have been to an attorney or it could have been
15 to anyone really as far as you know?

16 A Yeah, as far as I know.

17 Q Okay. And did he indicate whether anybody
18 had given him permission to send that message off?

19 A No. Are you talking about in the message
20 that he sent?

21 Q Well, as far as him having permission to be
22 at that kiosk at that time.

23 A I'm not sure what you're asking.

24 Q So he was at the kiosk whenever he was
25 supposed to be in his cell. Did you have any

1 knowledge of him having permission to be at the kiosk
2 even though you had told him to be in the cell?

3 A One more time.

4 Q Okay. All right. So just to lay the
5 picture to my understanding that we've talked about,
6 Mr. Sindell had contraband. So, therefore, he lost
7 his rec time and he was supposed to be in his cell at
8 2:00 o'clock while the rest of his tier was out doing
9 rec, whatever they were doing; right?

10 A Right.

11 Q Okay. And then he called for a tissue and
12 his cell was unlocked for someone to be able to pass
13 him a tissue; right?

14 A Correct.

15 Q He was still not supposed to leave his cell;
16 is that right?

17 A That's correct.

18 Q However, my understanding of what you
19 testified to is that he did leave the cell in order to
20 go to the kiosk; is that right?

21 A Correct.

22 Q Okay. And for his purpose of being at the
23 kiosk, even though you told him that he was not
24 supposed to be out, that he's supposed to be in his
25 cell, do you know whether or not anybody else had

1 given him permission to be at the kiosk?

2 A I do not know that.

3 Q Did you give him permission to be at the
4 kiosk?

5 A No, I did not.

6 Q And how many times did you ask him to go to
7 his cell before you issued the lockdown?

8 A More than one.

9 Q Okay. Do you know if it was more than two?

10 A I can't recall, but I know it was more than
11 one.

12 Q Did he have any verbal response to that?

13 A No, he did not.

14 Q Okay. So then what did you do once
15 everybody went on to lock down? What happened then?

16 A When everybody went into their cell, I
17 waited until movement came into the pod.

18 Q And by movement, do you mean assistance?

19 A Yes. Assisting officers.

20 Q And then who assisted?

21 A Deputy Cleckner, Deputy Boerger.

22 Q Okay. And then what did you observe between
23 Deputy Boerger, Deputy Cleckner and then Sindell?

24 A Sindell was walking from the kiosk towards
25 the two deputies. Deputy Cleckner gave him a set of

1 instructions. I don't know how many times. He gave
2 him a set of instructions to return to his cell. And
3 it happened so fast, I don't know what happened. I
4 really don't know if Sindell did anything or if he
5 didn't do anything. I don't know. But he just was
6 taken to the floor because he wasn't walking in the
7 direction of his cell. He was walking towards the
8 officer after he had told him to lock down.

9 Q Did you hear Mr. Sindell try to say anything
10 to Cleckner?

11 A I cannot recall.

12 Q To your recollection, was Mr. Sindell being
13 physically aggressive?

14 A I'm not sure.

15 Q Okay. What about verbally aggressive?

16 A I'm not sure.

17 THE WITNESS: Hey, she disappeared.

18 COURT REPORTER: I'm going to go off the
19 record while she reconnects.

20 (Whereupon, a discussion was held off the
21 record.)

22 BY MS. BURTON:

23 Q All right, Ms. Coach. Are you there?

24 A I'm here.

25 Q Okay. I'm so sorry about that.

1 A It's okay.

2 Q I'm trying to remember where we left off. I
3 can't remember where exactly we left off, but I'll
4 start where I remember asking you questions about. So
5 did you see Mr. Sindell being physically aggressive at
6 all?

7 A I'm not -- I just saw him walking toward the
8 two deputies. Whether he were physically aggressive
9 or not, I couldn't tell.

10 Q Okay. Did you see where his hands were?

11 A I can't remember.

12 Q Okay. Do you recall him saying anything?

13 A I can't remember.

14 Q So do you recall him making any threats?

15 A I cannot remember. Like I said, they were
16 not right beside me. They were further away. I
17 couldn't hear a conversation. But I just know
18 Cleckner very loudly told him to lock down. I
19 don't -- I couldn't hear anything else. I don't
20 recall hearing anything else.

21 Q Okay. Did you see -- and I know you said
22 that you were further back, but I'm just trying to
23 gain, like, a full understanding of what you did see
24 or what you did perceive. So did you see the actual
25 takedown?

1 A I did.

2 Q What do you remember from how that happened?

3 A I remember when Sindell was walking towards
4 Cleckner and Boerger. I just remember him going on
5 the floor. Like I say, it was quick.

6 Q Do you remember how he got to the floor?

7 A What do you mean, how he got to the floor?

8 Q So, well, you saw him walking toward the
9 deputies and then he went to the floor. Do you
10 remember how he got there?

11 A Deputy Cleckner is the one who put him on
12 the floor.

13 Q How did he do that?

14 A I don't know.

15 Q I'm just asking you to the best of your
16 memory and what you were perceiving at the time, can
17 you describe the movements or the physical contact
18 that Deputy Cleckner made?

19 A I mean, I'm not going to speculate. I
20 mean --

21 Q Yeah, I'm not asking you to. I'm just
22 asking you to tell me what you remember.

23 A I mean, I just remember he put him on the
24 ground. How he did it, I don't know.

25 Q Did you see the actual physical contact

1 made?

2 A I saw him when he grabbed him and put him on
3 the ground. How he grabbed him and where his hand was
4 and all of that, I don't know all of that.

5 Q So you don't remember where he grabbed him?

6 A No.

7 Q And then with Deputy Boerger, do you
8 remember whether he had any physical contact with
9 Sindell at the time?

10 A From the video, I just see Boerger -- from
11 the video, I just see Boerger kind of like breaking
12 his fall or something. I don't -- that's what I just
13 saw from the video.

14 Q Right.

15 A That incident from three years ago, I don't
16 have a good picture of that. I'm just -- what I'm
17 describing to you is what I see on the video, not that
18 I remember what happened three years ago. Because I
19 don't.

20 Q That's fair.

21 A I don't remember that. I just remember him
22 going to the ground three years ago. Who did what and
23 how they did it, I don't remember that. I'm just
24 looking at a video. I'm looking at a video in my
25 head.

1 Q Okay. So once he -- once Mr. Sindell got to
2 the ground, what happened after that?

3 A He began to have a seizure I think.

4 Q Okay. Do you know how long it was between
5 the time he hit the ground and his seizure began?

6 A Huh-uh. I don't remember.

7 Q Okay. Did you see which part of
8 Mr. Sindell's body hit the ground first?

9 A No, I didn't.

10 Q Okay. Had you -- okay. Do you recall how
11 long Mr. Sindell had been at the jail prior to this
12 incident?

13 A No, ma'am.

14 Q Had you seen him at the jail before this
15 time?

16 A Probably in another pod. I don't know.
17 Probably in another pod.

18 Q Okay. So I guess my question is do you know
19 or do you remember approximately how long you had
20 interacted with Mr. Sindell as far as just overseeing
21 his pod and then when the incident occurred?

22 A Repeat your question.

23 Q I'm trying to gauge the amount of
24 interactions that you had with Mr. Sindell prior to
25 the incident. So I guess whenever you first

1 encountered him at the jail, do you remember
2 approximately how long before that incident you first
3 encountered him?

4 A I change pods. Inmates change pods.
5 Inmates come back and forth out of jail. I don't
6 know. I don't know. I probably have and he -- I
7 don't know. I just don't know how much interaction
8 we've had. Again, this is three years ago. Inmates
9 come and go. Different inmates come and go. I had
10 just started working at that jail. So I didn't -- I
11 wasn't that familiar with inmates, those inmates
12 period. So if I had seen him, I didn't know that he
13 existed.

14 Q Okay. So nothing particular about him stood
15 out to you prior to the incident then; is that right?

16 A No.

17 Q So did you ever encounter him having a
18 seizure prior to that?

19 A I can't remember.

20 Q Okay. I know it's been three years, so I
21 understand if you don't remember every detail. I'm
22 just asking what you know and what you remember. Did
23 you have any understanding as to what his charges
24 were, why he was sitting in jail at the time?

25 A Nope. No, ma'am.

1 Q So you don't know whether it was for any,
2 you know, violent crime or nonviolent crime?

3 A I don't know anything, didn't know, still
4 don't know anything about the guy.

5 Q Okay. Did you have any reason -- well, let
6 me ask you this way. Had he ever had any sort of
7 physical manifestation of aggression prior to that
8 incident?

9 A Repeat that in simpler terms for me please.

10 Q Yeah. Had he ever been seemingly aggressive
11 to you?

12 A Who?

13 Q Mr. Sindell.

14 A Not that I can recall.

15 Q Okay. And do you recall him getting
16 aggressive at the time of the incident?

17 A When you say aggressive, what is your
18 meaning of aggressive?

19 Q Like, becoming aggressive.

20 A How do you define aggressive?

21 Q Do you -- did you understand Mr. Sindell to
22 be a threat to anybody, a physical threat to anybody?

23 A He -- potentially. If he was given a set of
24 instructions to lock down in his cell and he refused
25 to lock down after I instructed him, the entire pod is

1 locked down except him, I don't know what his mindset
2 could have been. So potentially.

3 Q Okay. But did he have any sort of physical
4 manifestations of aggression? For example, was he
5 yelling or was he bucking up with anybody? Was he
6 throwing anything?

7 A That's what I'm saying. I didn't hear any
8 yelling. That's not to say that he wasn't talking or
9 he didn't say anything to them. If he bucked up, I
10 can't recall him bucking up because I didn't see that.
11 I didn't see -- I couldn't see from where I was any of
12 his hand gestures or whatnot.

13 So if you're asking me if he was aggressive,
14 he could have been if he wouldn't return to his cell
15 when he was instructed to do so, not only by myself
16 but by the assisting deputies.

17 Q Okay. So --

18 A So it's possible.

19 Q So were you defining aggression as simple
20 non-compliance with the instruction to go to his cell?

21 A Your definition of aggressive may not be my
22 definition of aggressive, so I don't want to --

23 Q We'll use your definition.

24 A That's why I don't want to use that word
25 aggressive. Because what I define as aggressive may

1 not be what you define as aggressive. So when you say
2 aggressive, what do you -- how do you define
3 aggressive? Because, I mean, was he compliant? No,
4 he wasn't. Did he comply? No. Was he aggressive?
5 Maybe. Potentially. I mean, it depends on how you
6 want to define aggressive.

7 Q So whenever I'm saying aggressive, what I
8 mean is making threats to people or showing any sort
9 of body language that shows that he is going to be a
10 danger, an imminent danger to someone else.

11 A Again, it's hard to determine because if he
12 refused to lock down after he was told to do so, I
13 don't know what his intent was. I couldn't hear
14 anything. I couldn't see what his body language was
15 doing. I see a video from 25, 30 feet in the air. I
16 can't tell. I can't distinguish that.

17 Q Okay. I'm going to move on. So did you --
18 so you stated earlier that if an incident would arise
19 or a situation would arise, that it would be policy to
20 have the body cam rolling at the time.

21 A Right.

22 Q Did you have a body cam on that day?

23 A I did.

24 Q Was it in use at the time of the situation?

25 A Supposedly. I pressed the button to

1 activate it. I'm not sure why there isn't any video
2 footage. But I pressed the button to activate the
3 camera.

4 Q So to your knowledge, there is no video
5 footage; is that correct?

6 A I'm not saying that there is or there isn't.
7 I don't know where the video is.

8 Q Do you recall whether Cleckner was wearing
9 his body camera?

10 A I do not recall.

11 Q What about Boerger?

12 A I do not recall.

13 Q Okay. So then I think it's fair to say --
14 well, let me -- would it be fair to say then that you
15 don't know whether or not there's body cam footage
16 from either one of their cameras?

17 A I'm not sure if there's body camera footage
18 from either one of us.

19 Q Do you know whether any body camera footage
20 has been disclosed to the plaintiff?

21 A I'm not sure. I'm not sure.

22 Q So Mr. Sindell went into a seizure you said
23 after he went down to the floor. Do you remember how
24 long his seizure occurred?

25 A No, ma'am. I do not.

1 Q Okay. So once you guys realize that he was
2 having a medical episode, what did you do?

3 A Contact medical immediately.

4 Q Do you remember who made the initial contact
5 with medical?

6 A I do not remember.

7 Q Do you remember how long it took medical to
8 arrive at the scene?

9 A I do not remember.

10 Q Do you know or do you remember whether the
11 first interaction that Mr. Sindell had with medical
12 immediately prior to that incident was either in L pod
13 or was it in like the medical unit or was it somewhere
14 in between?

15 A It was in L pod.

16 Q Okay. So then to your recollection, medical
17 came to L pod?

18 A That's correct.

19 Q Okay. Do you remember if he had any
20 diagnosis after that as far as what happened?

21 A He was -- according to this --

22 Q I'm just asking about your -- I just want to
23 know about your personal knowledge.

24 A No, ma'am. I don't remember anything about
25 that guy after that incident.

1 Q Okay. And the incident when Mr. Cleckner
2 took Mr. Sindell to the ground, what were you -- do
3 you remember what you were thinking in that moment?

4 A No, ma'am. I do not remember.

5 Q Do you remember -- do you remember having
6 any, like -- do you remember what you were feeling in
7 that moment?

8 A No.

9 Q Okay. Were you feeling -- so you don't
10 remember if you were feeling scared or threatened?

11 A I vaguely remember this. My feelings, I
12 don't remember that stuff. I just don't remember that
13 stuff.

14 Q Did you see whether any actions were taken
15 in order to help prevent Mr. Sindell from obtaining
16 any injuries during that incident?

17 A Excuse me? Can you repeat that question?

18 Q Right. So do you remember if there were any
19 measures that were taken -- I know that you said
20 everything happened very quickly, but do you remember
21 anybody taking any action to try to prevent or
22 minimize any injuries Mr. Sindell could incur by being
23 taken to the ground?

24 A Like I said, it did happen fast, but just
25 looking at the video, I can see where Boerger was,

1 like, trying to break the fall from -- from Sindell.
2 They were the only two people that were there at that
3 time.

4 Q Other than -- so immediately after the
5 incident, other than Mr. Boerger and Cleckner, who
6 else was involved in the incident immediately after it
7 happened?

8 A I'm not sure, but I know my lieutenant,
9 Teresa Craig, she came to the scene. I'm not sure of
10 all the other people that were there. Again, we're
11 talking about three years ago. It's so many people
12 that has come and gone since then. I can't remember
13 those people. Cleckner doesn't even work there
14 anymore.

15 Q What about Boerger? Does he still work
16 there?

17 A Yes, he does. But he doesn't work -- he
18 moved to a different department.

19 Q Was he promoted?

20 A No, he wasn't promoted. He just moved to a
21 different department.

22 Q What department is he with now?

23 A Deputy Boerger works in transport.

24 Q So he's no longer overseeing pods or
25 anything like that?

1 A No, ma'am. He works in transport.

2 Q Do you remember giving an incident --
3 sorry -- an interview after the incident occurred?

4 A I remember.

5 Q Do you remember who you gave that interview
6 to?

7 A Lieutenant Runyon.

8 Q Is that George Runyon?

9 A That's correct.

10 Q Do you remember if any other person was
11 present during your interview?

12 A We had two separate interviews. One was
13 Lieutenant Runyon and myself alone that was a video
14 recording. And then the second -- well, another --
15 not a second one, but another interview was Lieutenant
16 Craig and Lieutenant Runyon and myself.

17 Q Okay. Were the two interviews based on the
18 same incident or were those separate incidents?

19 A I think they came from the same incident. I
20 think all of them was just the same thing. I think it
21 all was.

22 Q Okay. Did you review either one of those
23 interviews?

24 A I did.

25 Q Was it prior to taking today's deposition?

1 A Yes.

2 Q Okay. When was the last time that you
3 reviewed those interviews? Let me ask you this. Was
4 it closer to the time that it happened or was it
5 closer to the time you prepared for your deposition?

6 A Prepared for the deposition.

7 Q And you don't recall when approximately you
8 reviewed those?

9 A It was yesterday or the day before
10 yesterday. I can't -- I had to work this weekend, so
11 my days are off. It was probably yesterday or the day
12 before yesterday. One of the two.

13 Q Did you write up any report after the
14 incident?

15 A You're talking about three years ago?

16 Q Yes.

17 A Yes.

18 Q Was that reviewed by anybody?

19 A Yes.

20 Q Do you recall who reviewed your report?

21 A My lieutenant.

22 Q That would be Craig?

23 A Craig, yes.

24 Q All right. Did you -- do you know if
25 anybody else wrote a report afterwards?

1 A I'm not sure if anybody else read it. I'm
2 sure -- well, I'm not 100-percent sure, but because it
3 was -- because of the extent of this stuff, I'm sure
4 Lieutenant Runyon read it.

5 Q Okay.

6 A I mean, I wouldn't bet my last dollar on it,
7 but I'm sure he read it.

8 Q Have you reviewed anybody else's report on
9 the incident?

10 A What do you mean, somebody else's report?
11 Is there another report?

12 Q Well, I mean, that's what I had just asked.
13 You said that you wrote your own report. But do you
14 know if anybody else wrote their own report?

15 A No, I don't know.

16 Q Okay. So you don't know if Cleckner or
17 Boerger wrote a report then; is that right?

18 A I mean, I'm -- I don't know. I don't know
19 if they wrote a report or if they did use of force.
20 I'm not sure what they did.

21 Q Okay. And you already stated that you don't
22 know whether or not they had their body cams going at
23 the time; right?

24 A I don't know. I don't know. I just don't
25 recall what the body cam situation was with Boerger

1 and Cleckner. I know I had mine. I activated it.
2 Whether it recorded or not, I don't know. Because I
3 haven't seen any video from my video camera.

4 Q And when it comes to being -- when you're
5 hired on to the -- well, not the Department of
6 Corrections -- the detention center with Houston
7 County, were you required to take an oath of office in
8 order to get that position?

9 A Yes.

10 Q Do you remember what that oath of office
11 was?

12 A No, not verbatim.

13 Q All right. Do you remember essentially what
14 was in the oath of office?

15 A No, ma'am. I do not.

16 Q And -- okay. Well, after the incident
17 occurred, did you discuss it with any of your
18 colleagues?

19 A Yes.

20 Q Who did you discuss it with?

21 A A number of people.

22 Q Did you discuss it with Mr. Cleckner?

23 A Probably. I can't 100 percent say yes, but
24 it was something that I talked about. It was my
25 first -- it was my first incident since I had been at

1 the jail and coming from Department of Corrections to
2 the detention center, it was just different. I didn't
3 know what -- I didn't know how movement calls worked
4 there versus Department of Corrections. So it was a
5 brand new world for me.

6 Q By that, do you mean kind of like the way
7 they did things or they reacted?

8 A Yes. Yes. It's a different reaction.

9 Q Okay. So to your recollection, do you know
10 if you spoke to anybody other than Cleckner and
11 Boerger and the supervisors that you already had to
12 give interviews to?

13 A I mean, I spoke to a lot of people about it.
14 Of course, everybody's going to call and ask what
15 happened, what happened. You know, that's going to be
16 a question all the time. What happened with, who did
17 this or whatever. So that was a discussion, a lot of
18 the discussion.

19 Q So was that with your other colleagues?

20 A Yes.

21 Q What about inmates?

22 A Well, the inmates would come and tell me --
23 would say stuff to me about it.

24 Q Do you remember what they would say to you
25 about it?

1 A I was reading one of these reports and, like
2 I said, I can't remember this stuff verbatim, but I
3 just remember reading in this report where the inmate
4 came to tell me that Sindell was using -- was trying
5 to do stuff to get his time reduced and whatnot. But
6 like I said, that's just in the report. The one --
7 one of the -- the two orderlies, one black, one white,
8 when we discussed it after the fact, the guy was just
9 like he play too much and stuff like that.

10 You could hear the guy -- the inmates in the
11 cell saying it ain't that serious. It was just
12 different little chatter. I don't pay too much inmate
13 talk any attention. Because they talk. But I
14 don't -- as far as discussing Sindell with another
15 inmate just talking about the incident and this and
16 that, no, I don't do that.

17 Q Whenever you say that one of the
18 incidents -- or, one of the inmates say that he play
19 too much, what does that he mean, he plays too much?

20 A Well, you would have to ask that inmate that
21 said that.

22 Q That's fair. So whenever it was said to
23 you -- well, let me back up. Do you recall -- do you
24 recall the interview that you gave with your
25 Lieutenant Craig regarding the book incident?

1 A I mean, do I recall -- I don't recall it
2 verbatim, no. But I --

3 Q All right. Do you recall the topic of
4 Sindell playing a lot? Do you recall that subject
5 coming up?

6 A Excuse me?

7 Q The description that Sindell likes to play,
8 do you recall that coming up?

9 A Yeah. I remember. And, again, I read that
10 in one of the reports and I do remember -- because
11 he -- Sindell was very playful even with me in the
12 beginning, you know, when I started -- when I came
13 into L pod and whenever I had any interaction with him
14 for his cell section -- and that's the only
15 interaction that I had with this guy -- he was
16 playing. He was always playing.

17 And so when the pod worker was called up to
18 do the interview and whatnot, he was like he play too
19 much. His -- that pod worker said he didn't want to
20 be -- he didn't want to be in the middle of that mess.
21 And that ain't the word he used. He play too much.
22 And I just remember him being aggravated. He play too
23 much. But I had noticed that. I knew that anyway.

24 Q So then your understanding of what it means
25 to play in regards to Mr. Sindell, do you -- do you

1 understand that to mean like he's just being playful
2 like in a positive energy type of way or trying to be
3 funny or can you describe what you understand that to
4 mean?

5 A I don't know how you want to -- okay. So
6 when I would go into his cell, he was never mean to
7 me. He was never rude to me. Okay. He was playful.
8 If I -- if I -- in the beginning, I did not tell these
9 inmates to get up out of their bed, because when I did
10 the top tier -- or, the cell search, they would still
11 be asleep. So I'd tell them stay in the bed, but I'm
12 going to look around that bed. I'm not going to make
13 them get up and all this other good stuff.

14 He was like, oh, you're tickling my feet,
15 you're tickling my feet. You know, he would do stuff
16 like that. And, you know, I remember now that I --
17 when I read this stuff, I do remember him saying the
18 reason why he couldn't get out of the bed is because
19 he had an erection. I have an erection; I'm not going
20 to get -- you know, stuff like that, play too much.
21 This pod worker observed the same thing that I'm
22 seeing, if that -- if that answers your question.

23 Q Yes, it does I think. Thank you. So
24 whenever you said he plays, you're not -- is it fair
25 to say that you don't mean a negative type of way?

1 A No. In the beginning, no. He wasn't -- he
2 wasn't a mean person to me. He wasn't mean to me.

3 Q Okay. And then I think that you had
4 mentioned that almost immediately prior to this
5 incident as far as him being on lockdown with the
6 contraband, it referred to some books and whatnot.
7 Can you describe that incident a little bit better to
8 me, can? Kind of give me as many details as you
9 remember about the details with the contraband.

10 A And I'm just going back to the reports that
11 were written.

12 Q Are they your reports?

13 A Excuse me?

14 Q Your reports that you wrote?

15 A No, the reports -- the stuff that I got -- I
16 received in looking at this deposition stuff.

17 Q Okay. I just want to make sure it's
18 refreshing your memory about it. I don't really want
19 you to testify to what someone else was saying about
20 it but just what you remember.

21 A Okay. Well, like I say, just reading the
22 reports, it just comes back to my memory.

23 Q Okay.

24 A But when I went into his cell -- which day
25 it was, I don't know -- one day he had all of this

1 stuff in his cell. And I would get their contraband
2 out of the cell. And he went back and said, well, you
3 forgot this right here. Okay? Well, the next day
4 when I go in your room, I'm going to make sure you get
5 up out of your bed since you're showing me that I
6 forgot something because it's up under your bed.
7 Right?

8 So when I go into his room and he got
9 whatever it is that he has, I get it out of the cell.
10 If it's trash, it's trash. If it's leftover --
11 whether it's him or it's the next inmate, whoever. If
12 they have leftover food in their cell, it goes in the
13 trash can. If they have condiments, it goes in the
14 trash can. If they have trash, it's trash. Books, I
15 don't throw books in the trash can.

16 The inmates have -- not only Sindell --
17 inmates have a bad habit of hoarding books in their
18 room. When the books come into the pod from ISU, the
19 books are nice. They're new. They're neat. Right?
20 And they race at those books and they get three, four,
21 five, six books. Right? No other inmate have the
22 opportunity to get a book because whichever tier out
23 had the opportunity to get the books. Okay?

24 So they have a habit of hoarding books.
25 What I would do for the pod is collect the books so

1 that everybody have an opportunity to read some books.
2 Do I throw books in the trash can? No, I do not.
3 That's the reason why I don't throw books in the trash
4 can. Because I know they hoard them so that other
5 people -- they'll put them back once they're done
6 reading them. But you're going to be one person in a
7 cell with six books when you're only allowed to have
8 three, which includes the Bible.

9 Q So then you go into Mr. Sindell's cell to
10 do -- would that have been like during the routine
11 shakedown?

12 A Yes.

13 Q So you found contraband. Do you remember
14 specifically what the contraband was?

15 A No, ma'am. I do not.

16 Q Do you remember a situation occurring with
17 his mattress?

18 A Yes.

19 Q Tell me -- tell me specifically what you
20 remember about that.

21 A Okay. So this is the day he had the
22 erection. Right? So he said he had the erection.
23 What I did, I lifted -- lift the -- okay. So if he's
24 laying in the bunk, the right side of the mattress, I
25 lifted the mattress and I took my hand and I brushed

1 underneath the mattress. He dramatically rolled over
2 onto the corner, to the wall side of that bed, to the
3 wall side. Oh, my God; why don't you just -- why
4 don't you just rip the mattress from under me and --
5 and throw it on the floor like you did yesterday.
6 Like, I didn't throw a mattress. And so I'm just
7 like, well, get up.

8 So when he dramatically rolled over, that
9 made the mattress loose. So I was trying to give him
10 the opportunity to get the mattress. He was like just
11 throw it on the floor. Did I throw it on the floor?
12 No. I put it on the floor. So whether or not he want
13 to consider it throwing, no. I put it on the floor.
14 I wasn't going to beg you to put the mattress back up
15 on your bed either.

16 So that was that incident. And underneath
17 that bed was like -- I think it was some -- and I'm
18 going off of the report -- gloves with lotion in it.
19 Possession of -- that's contraband. Some jelly
20 packets. Contraband. And some old -- again, I don't
21 remember this. That's just what the report read.

22 Q You didn't find any weapons or anything like
23 that, anything dangerous under there, did you?

24 A No. No, ma'am.

25 Q Do you remember if any injury occurred from

1 him rolling off the mattress?

2 A I don't recall an injury.

3 Q Okay. Did you have any negative feelings
4 towards Mr. Sindell at that time?

5 A I didn't care anything about him one way or
6 the other because he -- he didn't bother me. He just
7 was another inmate. I'm just doing my job and moving
8 on to the next person.

9 Q So you -- and earlier you said that in the
10 beginning whenever you first started working there
11 when Mr. Sindell was there, his treatment of you was
12 not negative in any way. It was playful. How was his
13 attitude towards you during the time that you did this
14 particular shakedown?

15 A He was beginning to get an attitude with me.
16 He -- he became upset with me. He was beginning to
17 not treat me as nicely. And like I said, just
18 refreshing my memory and stuff and he recalled an
19 incident where I asked him to be a worker and he said
20 no. He thought that I was upset because he said no.
21 But I wasn't upset. He said no. Okay. You move to
22 the next person. And maybe he -- he felt as if, but,
23 no.

24 Q Did he indicate why he declined your offer
25 for him to be a worker?

1 A I cannot remember. Like I said, I -- I read
2 that in one of his reports. But I do remember after
3 reading that report that he said no. Why he said
4 no -- I don't think according to his report it's
5 because I don't let the inmates stay out for both
6 recs. You recall me talking about the different recs;
7 right? Whichever tier is out, that's the tier --
8 that's where I choose the inmates from. Some officers
9 let the inmates stay out for both the recs and I
10 didn't.

11 So I think that's what his -- I think if I
12 remember him -- I remember reading the reason he
13 didn't want to work is because I would not let him
14 stay out for both recs.

15 Q Can you describe a little bit about what a
16 worker inmate would do?

17 A They would pass out the trays, ice and fill
18 juice at breakfast and lunchtime. They would after
19 lunch -- I mean, after each meal -- okay.

20 Q I don't know what happened with the screen.

21 A Yep. Mine said -- I'm going to hit remind
22 me later. Okay. Here we go. It's asking for an
23 update.

24 Q Oh, for Zoom?

25 A Yes.

1 Q Okay. Hopefully we won't have any more
2 issues. So do you look for any particular qualities
3 for an inmate before you offer them that worker
4 position?

5 A Yes and no. I give them -- the first time
6 that I would choose an inmate -- because I really
7 don't know who they are and what their character is.
8 When I choose an inmate, if they are up and ready to
9 go, I would choose them. So after them working a
10 day -- because what I like to do is whichever -- like,
11 if I work Monday and Tuesday, whichever inmate that
12 works Monday, he works Tuesday because that's the
13 rotation. It's easier for me to keep up with. I
14 ain't got to change them up every day. So I like to
15 work them in the same rotation.

16 So when I choose them, I'm watching them and
17 I'm watching who they are on that first day. I'm
18 watching to see if they're stealing. I'm watching to
19 see if they're not doing what I ask them to do. If on
20 that first day they do something that I don't like,
21 they don't work with me. If they are messy -- and I
22 mean, by messy, if they are just carrying messages
23 from inmates to inmates, they don't work.

24 If they're stealing -- I ain't going to say
25 stealing -- if they're getting the food off of trays

1 and taking them to different cellmates, different
2 inmates' rooms, I don't want him working anymore.
3 When you're supposed to be cleaning and if you're
4 trying to find something to do other than what you're
5 supposed to be doing, you can't work for me again. So
6 it's not that I'm being strict. It's just that let's
7 take care of business first and then I'm going to give
8 you some playtime. But let's take care of the
9 business first.

10 Q Was there anything in particular that you
11 remember about Mr. Sindell, why you offered him that
12 position that day?

13 A Because he was up and ready to go. More
14 than likely it was because he was up and ready to go.

15 Q Would you -- well, let me ask you this. Do
16 you know if you had very many colleagues who have also
17 worked prior with the Department of Corrections?

18 A Yes.

19 Q Would you describe them as more strict than
20 the deputies that just come on with Houston County at
21 first or some other jail as opposed to the Department
22 of Corrections?

23 A Rephrase your question please.

24 Q So would you say that some deputies are more
25 restrictive than others, like being sticklers for the

1 rules? Some give more leeway than others?

2 A Some will give more -- some will give -- it
3 depends on the person. It depends on the person.
4 Some were more strict. Some a little bit more laid
5 back. It just depends on the person.

6 Q Have you noticed any theme with those who
7 give a little more leeway did not have any prior
8 experience with things that are, like, maybe harder
9 environments, like prisons?

10 A You said what now? Repeat yourself. I'm
11 sorry.

12 Q So the ones that you have observed being
13 more laid back as opposed to the more restrictive
14 jailers, would they have like a commonality as maybe
15 they didn't have a background at the Department of
16 Corrections before?

17 A Are you talking about now or then?

18 Q Just in general since you've been at Houston
19 County.

20 A It's kind of 50/50. It's kind of 50/50.
21 You have some people that come in with no experience
22 and because they have no experience, they don't
23 understand the manipulation of inmates. So that's one
24 thing. Then you've got the other thing that is I'm
25 old enough to be -- most of my coworkers, I'm old

1 enough to be their parent. These are kids that's
2 coming in and it's -- I just notice that it's hard for
3 these younger -- this younger crew that's coming in,
4 it's harder for them to supervise inmates that are
5 their peers.

6 Then you have male versus female. Males --
7 the population there is predominantly male. Males
8 don't see what females see. Males kind of like let
9 them tend to do what they want to do because it's
10 easy. Women are more stricter than the males.
11 They're a little more structured.

12 So it's kind of 50/50. And it depends on
13 that person, not necessarily what the background is,
14 but the person itself. Because even with myself, I
15 had prior GDC experience, but I never had jail
16 experience. The only thing I know about that jail was
17 reading the handbook and that's how I was learning how
18 to work the pods.

19 Because, respectfully, the people that were
20 training me, I didn't like their style because they
21 let the inmates get away with too much stuff. So I
22 don't need my supervisor calling me asking me why
23 doesn't an inmate have on his armband. Well, it's in
24 the handbook that you're supposed to wear your armband
25 at all times. So those were things that I enforced

1 that others didn't.

2 So it depends on the person. I've seen
3 people from GDC -- GDC runs totally different from a
4 jail simply because the inmates are out all day in
5 GDC. They're out all day. They do their own thing.
6 In jail, they need to be monitored a little bit closer
7 than what they do in the prison. The lockdown, stuff
8 like that, you have to work in the jail versus working
9 in a prison. I mean, it's -- it's busy work, but you
10 have to work a little bit more than you would in GDC.

11 And so officers from GDC, they're used to
12 letting inmates run all day and do whatever they got
13 to do. You come to me if you need something. It's
14 just a totally different environment. So it depends
15 on the officer.

16 Q So which category would you put yourself in,
17 the more restrictive or the more laid back?

18 A Restrictive.

19 Q So other than speaking with Mr. Waymire and
20 reviewing the reports that you've already talked about
21 and the video that you already talked about, what else
22 did you do in order to prepare for today's deposition?

23 A Nothing.

24 Q Okay. And have you reviewed any other
25 materials that we haven't already discussed?

1 A No.

2 Q Okay. And do you recall -- is there
3 anything else that you recall from either the
4 incidents, the first one being Mr. Sindell's cell with
5 the contraband and the mattress and then the incident
6 that's giving rise to this occasion with him being
7 taken to the ground and his seizure -- is there
8 anything about either one of those incidents that you
9 recall that we haven't already discussed?

10 A Not off the top of my head. I mean, I might
11 have a few questions for Mr. Waymire after this
12 deposition. But as of now, I do not.

13 Q Okay. Well, I don't think I have any other
14 questions for you at this time. Well, actually, no,
15 that's not true. I do have one other question. Did
16 you review your responses to the interrogatories?

17 A Nope. I don't even know what the
18 interrogatories are.

19 MS. BURTON: Okay. Jason, I'll touch base
20 with you on this later. I'll email you. Okay?

21 MR. WAYMIRE: Yep.

22 MS. BURTON: So I don't have any other
23 questions for you at this time. Mr. Waymire
24 might have some questions for you.

25 MR. WAYMIRE: I have no questions. We're

1 done.

2 MS. BURTON: Perfect. All right. Thank you
3 so much for taking time this morning -- it's
4 almost 12:30 -- to give this deposition and I
5 hope that you have a good relaxing rest of your
6 day.

7 THE WITNESS: Thank you so much. You guys
8 have a wonderful day.

9 (Whereupon, the deposition was concluded at
10 12:29 p.m.)

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DISCLOSURE

STATE OF GEORGIA Deposition of LaTonya Coach

COUNTY OF COBB Date: June 26th, 2023

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This the 26th day of June, 2023.

BONNIE L. SMITH, RPR, CCR
CCR-B-2432

C E R T I F I C A T E

STATE OF GEORGIA)

COUNTY OF COBB)

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the proceedings were reduced to typewriting under my direction and control.

I further certify that the transcript is a true and correct record of the evidence given at the said proceedings.

I further certify that I am neither a relative or employee or attorney or counsel to any of the parties, nor financially or otherwise interested in this matter.

This the 26th day of June, 2023.



Bonnie L. Smith

BONNIE L. SMITH, RPR, CCR B-2432

	8:15	alone (1)	assist (3)
[adequately (1)	82:13	50:15;57:11,17
	49:25	along (1)	assistance (2)
[sic] (1)	affect (2)	32:15	50:12;68:18
22:23	6:14,19	alternate (2)	assisted (1)
	afternoon (1)	63:23;64:9	68:20
A	65:11	always (4)	assisting (4)
	afterwards (3)	13:21;37:15;47:25;88:16	28:1,9;68:19;76:16
ability (2)	39:3,4;83:25	amount (1)	assume (3)
6:15,19	Again (17)	73:23	6:4;26:12;40:1
able (9)	18:6;21:10;28:4,19;	answered (1)	assured (1)
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